

# **EXHIBIT C**

United States Bankruptcy Court  
Southern District of New York

In re:

*Motors Liquidation Company, et al.,  
f/k/a General Motors Corp., et al.*

Debtors

)  
)  
)  
) Case No. 09-50026 (REG)  
) Chapter 11  
)  
)

**RESPONSE OF DEBTORS  
OBJECTION TO PROOF OF CLAIM #70180**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE

Betty E. Dalton submits this response concerning the Debtors objection to late-filed claim, #70180, based on the following:

**ARGUMENT**

- 1) The Debtors did not adequately communicate Bankruptcy filing information in the rural area in which I live.
- 2) The discovery of the lawsuit began when I was contacted by General Motors by email in late February 2010, inquiring if I would be interested in purchasing a new vehicle. The email was received a few weeks after I had viewed a TV episode concerning vehicle safety crash tests that included the year and model of the vehicle in which was my husband was fatally injured in 2007 due to the failure of airbags to deploy. Only after several contacts with General Motors customer service in March 2010 concerning the non deployment of airbags recall, was I informed of the lawsuit and given the contact information. It took about 2 weeks to compile the supporting documentation to adequately file Proof of Claim dated March 30, 2010.
- 3) General Motors is accountable for product they manufacture along with the consequences when they fail to function properly especially in the loss of human life.
- 4) Proof of Claim #70206 is a duplicate claim and needs to be removed from this case.

Copies sent to:

(i) WEIL, GOTSHAL & MANGES LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.)

(ii) Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow)

(iii) General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.)

(iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.)

(v) the United States Department of Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.)

(vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47<sup>th</sup> Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.)

(vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq. and Jennifer Sharret, Esq.)

(viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York, 10004 (Attn: Tracy Hope Davis, Esq.)

(ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuchler, Esq.)

(x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35<sup>th</sup> Floor, New York, New York, 10152-3500 Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W. Suite 1100, Washington DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.)

(xi) Stutzman Bromberg, Esserman, & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, TX 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.)

Date: February 16, 2011

Signature: Betty E. Dalton  
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